

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
RALEIGH DIVISION**

IN RE:)
)
HEADWAY WORKFORCE) **Case No. 25-01682-5-JNC**
SOLUTIONS, INC., et al.¹) **Chapter 11**
) **(Jointly Administered)**
Debtors.)

**DEBTORS' AMENDED DESIGNATION OF EXHIBITS AND
POTENTIAL WITNESSES FOR MAY 20, 2025 HEARING**

Headway Workforce Solutions, Inc. *et al.*, (collectively, the “Debtor”), the above-captioned debtor in possession, hereby files this Designation of Exhibits and Potential Witnesses. The Debtor discloses the following exhibits and potential witnesses in connection with the hearing scheduled for May 20, 2025 at 1:00 p.m. on the following matters: Debtors’ Emergency Motion for Order Authorizing Debtors to Pay Wages Accrued Pre-Petition [DE# 18] and Debtors’ Expedited Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Post Petition Financing, (II) Granting Senior Liens and Superpriority Administrative Expense Status, (III) Authorizing Use of Cash Collateral, (IV) Granting Limited Relief from the Automatic Stay, and (V) Granting Related Relief [DE# 41].

Designation of Exhibits²

- (1) DIP Budget
- (2) Memorandum of Understanding
- (3) Administrative Services Agreement
- (4) Declaration of Brendan Flood

¹ The Debtor in these Chapter 11 Cases, along with the last four digits of each Debtors Federal Employer Identification Number: Staffing 360 Solutions, Inc. (0859); Monroe Staffing Services LLC (1204); Key Resources, Inc. (9495); Lighthouse Placement Services, Inc. (8093).

² The Debtor and interested parties are still in negotiations and reserve the right to supplement the notice of exhibits and witnesses.

Designation of Potential Witnesses

- (1) Brendan Flood
 - a. Title: Chairman and Chief Executive Officer, Headway Workforce Solutions, Inc.
- (2) Ramonda Mettry
 - a. Title: Member AR Team, Noor Staffing Group

Respectfully submitted, this the 19th day of May, 2025.

HENDREN, REDWINE MALONE, PLLC

s/ Rebecca Redwine Grow
Jason L. Hendren (NC State Bar No. 26869)
Rebecca Redwine Grow (NC State Bar No. 37012)
Benjamin E.F.B. Waller (NC State Bar No. 27680)
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ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DEBTOR'S AMENDED DESIGNATION OF EXHIBITS AND POTENTIAL WITNESSES FOR MAY 20, 2025 HEARING** was filed electronically in accordance with the local rules and was therefore served electronically on those entities that have properly registered for such electronic service, and by e-mail on the parties listed below.

Brian C. Behr
U.S. Bankruptcy Administrator

This the 19th day of May, 2025

HENDREN, REDWINE MALONE, PLLC

s/ Rebecca Redwine Grow

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